

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

-against-

CHARLIE JAVICE and OLIVIER AMAR,

Defendants.

NOTICE OF MOTION

Case No.: 1:23-cr-00251-AKH

PLEASE TAKE NOTICE that upon the Memorandum of Law in Support of Defendant Charlie Javice's Motion to Dismiss and For a Bill of Particulars, dated April 5, 2024, Defendant Charlie Javice, by and through undersigned counsel, respectfully moves this Court pursuant to Federal Rules of Criminal Procedure 12(b)(3)(B)(i), (iii), (v) and 7(c)(1) for an order dismissing the Superseding Indictment (ECF 27). In the alternative, to the extent that this Court denies the Motion to Dismiss as to any counts of the Indictment, Ms. Javice moves under Federal Rule of Criminal Procedure 7(f) for an order directing the Government to produce a bill of particulars as to each surviving count, as set forth in the Memorandum of Law.

PLEASE TAKE FURTHER NOTICE that pursuant to Local Criminal Rule 16.1, the undersigned counsel has met and conferred with the Government and attempted to resolve the issues raised by the bill of particulars motion in good faith without the Court's intervention, as described in the accompanying Declaration of Samuel P. Nitze submitted herewith.

Ms. Javice respectfully requests that the Court hold oral argument on this motion at a date and time convenient for the Court.

Dated: April 5, 2024

Respectfully submitted,

**QUINN EMANUEL URQUHART &
SULLIVAN LLP**

By



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CERTIFICATE OF SERVICE

I hereby certify that on April 5, 2024, I caused a copy of the foregoing document to be served via ECF on counsel of record.



Alex Spiro